

Bonnie A. Freeman, Esq. (SB 180502)
Kathleen Mullins Henderson, Esq. (SB 258861)
SENNEFF FREEMAN & BLUESTONE, LLP
50 Old Courthouse Square, Suite 401
P.O. Box 3729
Santa Rosa, CA 95402-3729
Telephone: 707-526-4250
Facsimile: 707-526-0347

Attorneys for Defendants County of Sonoma (also sued as Sonoma County Sheriff's Department), Bill Cogbill, Lewis Lincoln, Daniel Cortez and Eduardo Espino

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

ERIC JAMES BAKER,

No. CV 08 3433 EDL

Plaintiff,

**STIPULATION TO VACATE PRETRIAL
CONFERENCE PENDING DISMISSAL
OF ACTION; PROPOSED ORDER
THEREON**

SONOMA COUNTY SHERIFF'S
DEPARTMENT, et al.,

Defendants.

The parties to this action, by and through their respective counsel of record, hereby stipulate to all of the following:

1. The parties anticipate that dismissal of the case with prejudice will be filed within ten (10) days;

2. The vacating of the pretrial conference set for June 8, 2010, will promote the efficient use of the Court's time pending the filing of the papers requesting the entry of dismissal;

3. The parties agree to diligently prepare and finalize all papers necessary in order to file the dismissal within the time above stated.

SO STIPULATED.

1 DATED: June 3, 2010

SANFORD WITTELS & HEISLER, LLP

2 By: _____/s/
3 Thomas M. Litton, Esq.
4 Attorneys for PLAINTIFF

5
6 TRIMBLE, SHERINIAN & VARANINI

7 By: _____/s/
8 JEROME M. VARANINI, ESQ.
9 Attorneys for Defendants CALIFORNIA
10 FORENSIC MEDICAL GROUP, INC. and
11 JAMES LUDERS, M.D.

12 SENNEFF FREEMAN & BLUESTONE, LLP

13
14 By: /s/ Bonnie A. Freeman-----
15 Bonnie A. Freeman
16 Attorneys for Defendants County of Sonoma, Sheriff Bill
17 Cogbill, Correctional Officers Lewis Lincoln, Daniel
18 Cortez and Eduardo Espino

19 [PROPOSED] ORDER

20 GOOD CAUSE APPEARING THEREFORE, IT IS HEREBY ORDERED that the pretrial
21 conference scheduled for June 8, 2010, is hereby VACATED. The parties are directed to have the
22 dismissal with prejudice of this action filed no later than _____.

23 Date: _____

24 Hon. Elizabeth D. Laporte